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Moag & Co., LLC and John A. Moag Jr.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE APPLICATION OF DANIEL
SNYDER for an Order Directing Discovery
from Verizon Communications, Inc. Pursuant
to 28 U.S.C. § 1782

Case No. 21-cv-00819

**NOTICE OF MOTION TO INTERVENE
AND TO TRANSFER CASE TO
DISTRICT OF MARYLAND**

To: David Murphy, Esq.
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Jordan W. Siev
(*Pro Hac Vice Motion Forthcoming*)
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New York, NY 10022
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PLEASE TAKE NOTICE that, on February 16, 2021, or on such adjourned date as determined by the Court, movants/proposed intervenors Moag & Company, LLC and John A. Moag Jr., by their undersigned counsel, hereby move to intervene pursuant to Rule 24(a)(2) and (b)(1), Fed. R. Civ. P., and to transfer this action to the United States District Court for the District of Maryland pursuant to 28 U.S.C. § 1404(a). As set forth in the accompanying Memorandum of Law in Support, Movants are the real parties in interest for the discovery sought by Petitioner Daniel Snyder, and Petitioner and Movants are currently engaged in litigation in the District of Maryland over the same materials sought by Petitioner through this action. The convenience of

parties and witnesses and the interests of justice warrant transferring this Petition to the District of Maryland, where it might have been brought.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

Dated: Jan. 19, 2021

Respectfully submitted,

GREENBERG TRAURIG, LLP

By: /s/ Roger B. Kaplan

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing Motion to Intervene and Transfer and the accompanying Memorandum in Support were served on counsel of record via ECF and sent by first-class, postage-prepaid mail to Verizon Communications, Inc., One Verizon Way, Basking Ridge, New Jersey, 07920.

/s/ Roger B. Kaplan

Roger B. Kaplan